

KINGSTAD LAW FIRM, LLC
ATTORNEYS AT LAW
 4811 South 76th Street, Suite 410
 Greenfield, Wisconsin 53220
 Telephone (414) 281-5500
 Facsimile (414) 281-5444

Gemignani, Joseph and Barbara

Attn: Joseph Gemignani

Page: 1

08/30/2022

Account No: 14420-00

Statement No: 21362

Chapter 13 Bankruptcy

Fees

		Hours	
09/29/2021	Initial meeting with client - lasted 1.5 hours but billed for only one-half hour (initial first hour no charge); gather information from client and lay contours of case and explain procedures of Chapter 13.	0.50	150.00
10/01/2021	Meet with Mr. and Mrs. Gemignani and gather additional information; further description of Chapter 13 procedure and contours of possible Chapter 13 Plan.	1.20	360.00
10/15/2021	Meet with Mr. Gemignani to gather additional information and documents; review same and further explanation of Chapter 13 Plan and procedure.	0.60	180.00
10/21/2021	Mr. Gemignani is in to drop off additional documents; short meeting with him to review additional documents and review Chapter 13 Plan and schedules.	0.40	120.00
10/22/2021	Final review of bankruptcy schedules, income and expenses and assets in preparation for filing of case.	1.00	300.00
11/04/2021	Review schedules in preparation for meeting with clients to review and sign full schedules; prepare motion to extend time to file Chapter 13 Plan.	1.00	300.00
11/05/2021	Prepare motion to extend time to file Chapter 13 Plan and direct paralegal to file same.	0.30	90.00
11/11/2021	Prepare amended schedules and Chapter 13 Plan for clients to sign.	1.00	300.00
11/18/2021	Review Objection to Confirmation filed by JPMorgan Chase Bank.	0.50	150.00
	Prepare for and attend §341 Meeting of Creditors.	1.00	300.00
12/07/2021	Prepare for and attend Hearing on Objection to Confirmation by Chase Bank.	0.80	240.00
01/19/2022	Review correspondence filed by Condo Association; Court will accept letter as an objection to confirmation and schedule hearing.	0.50	150.00
01/25/2022	Prepare for and attend adjourned hearing on Objection to Confirmation by Chase Bank.	0.50	150.00
03/01/2022	Prepare for and attend adjourned hearing on Objection to Confirmation by Chase and		

Chapter 13 Bankruptcy

		Hours	
	by Condo Association; research re validity and extent of lien held by Condo Association based on representations by Condo Association on the record - lien is probably not valid.	1.50	450.00
03/30/2022	Research re validity of condominium lien filed by Sharpe's Condo; prepare email correspondence to representatives of association regarding validity of lien.	1.50	450.00
04/05/2022	Prepare for and attend adjourned hearing on OTC by Chase and Condo Association; Chase still has to complete its appraisal so Court adjourned hearing again; based on representations by DGK Court overruled Condo Association objection to confirmation; prepare and submit proposed Order Overruling Objection by Condo Association.	1.50	450.00
05/10/2022	Review file and prepare for and attend adjourned hearing on objection to confirmation by Chase; Chase wants to market the Day property and parties wish to discuss appraisal of Elkhart Lake property. Matter adjourned to 6/7/22 but Court will schedule an evidentiary hearing at that time.	0.60	180.00
06/01/2022	Email exchange with client regarding progress of appraisals and evidentiary hearing status.	0.50	150.00
06/06/2022	Email exchange with Attorney Drout re sale of Day and progress of appraisals and valuation of Elkhart Lake property.	0.50	150.00
06/07/2022	Prepare for and attend adjourned hearing on objection to confirmation by Chase; Court schedules an evidentiary hearing to be held 9/8/2022. Review and calendar critical dates for evidentiary hearing.	1.00	300.00
06/28/2022	Prepare motion to sell real estate based on representations of closing department (closing department indicates all liens will be paid at closing).	1.50	450.00
06/29/2022	Email exchange with client re evidentiary hearing on valuation of Elkhart Lake property and discovery - client provides proposed discovery; review same.	0.50	150.00
07/07/2022	Email exchange with client regarding additional proposed discovery; review same and begin refashioning discovery for service on Chase.	0.50	150.00
07/12/2022	Review response filed by Attorney Drout on behalf of Chase regarding motion to sell; Chase has no objection to the motion to sell but requires all liens to be paid at closing; numerous email exchanges with Attorney Drout and client re lien payoff to close.	1.50	450.00
	Email exchange with Gray & Associates regarding stipulation to vacate sheriff's sale of Day property to allow for sale of property.	0.40	120.00
07/13/2022	Numerous email exchanges with Attorney Drout and client regarding closing and payment of Capital One judgment.	0.60	180.00
07/14/2022	More email exchanges with title company closing department, Attorney Drout and client regarding payment of outstanding lien at closing. Capital One has provided a letter that release is in progress.	0.60	180.00
07/15/2022	Additional email exchanges regarding progress of closing in light of lien release; review supplemental response filed by Attorney Drout to motion to sell real estate and		

Chapter 13 Bankruptcy

		Hours	
	prepare and file letter to Court regarding status and proposed Order Allowing Sale.	0.80	240.00
07/18/2022	Review docket re Court scheduling hearing on motion to sell property; review file and prepare and file additional correspondence to Court re motion.	0.80	240.00
07/19/2022	Prepare for and attend hearing on motion to sell real estate; Court denies motion and directs debtors to file motion to sell free and clear of liens with an abbreviated notice time.	0.80	240.00
	Prepare and file motion to sell real estate free and clear of liens.	1.00	300.00
07/21/2022	Review Order filed by Court regarding motion to sell real estate; Court indicates efforts to serve motion reflected in Affidavit of Service do not suffice; review and find additional contact names and addresses for service and provide service; prepare and file supplemental Affidavit of Service of motion to sell real estate free and clear of liens.	2.50	750.00
07/22/2022	Review discovery received from Chase re evidentiary hearing on valuation of Elkhart Lake property.	1.00	300.00
07/26/2022	Prepare and serve discovery on Chase regarding evidentiary hearing on valuation of property.	2.00	600.00
08/01/2022	Email exchange with Attorney Drout re settlement proposal for valuation of Elkhart Lake property.	0.50	150.00
08/04/2022	Numerous email exchanges with client regarding settlement proposal for valuation of Elkhart Lake; client proposes to settle at \$377,000.00.	0.80	240.00
08/05/2022	Email exchange with Attorney Drout regarding settlement at \$377,000.00 based on client's own appraisal; Attorney Drout requests copy of client's appraisal; in various email exchanges client will not provide his appraisal; says he has already provided it (client did not).	0.50	150.00
08/08/2022	Prepare and file Order Allowing Sale of Real Estate Free and Clear of Liens.	0.50	150.00
	Various email exchanges with client regarding providing his appraisal to Chase to support his counter-offer; client refuses to provide appraisal.	0.80	240.00
08/09/2022	Court has signed Order Allowing Sale of Real Estate Free and Clear of Liens; provide copy to title company and client.	0.50	150.00
	Email exchange with client; he has gone straight to Attorney Drout regarding argument over appraisal and additional issues regarding settlement.	0.40	120.00
08/10/2022	Numerous email exchanges with Attorney Drout and client; Chase has agreed to \$377,000.00 counter proposal made by client but now client no longer wishes to agree to this amount; client believes additional clarifications should be made in order to settle.	0.80	240.00
08/11/2022	More email exchanges with client regarding settling valuation issue at \$377,000.00; client agreed to settle at this amount and counter-proposal made at this number, but client refuses to accept without additional conditions. Commence preparation of motion to withdraw.	0.50	150.00

Chapter 13 Bankruptcy

		Hours	
08/12/2022	Prepare and file motion to withdraw; forward copy to client; numerous email exchanges - client agrees to withdrawal but wants to lodge additional unfounded criticism.	0.80	240.00
08/15/2022	More email correspondence with client regarding progress and status of case and requesting additional information regarding discovery process. Provide authorization to Attorney Drout to communicate directly with client.	0.50	150.00
08/19/2022	Review email exchange between client and Attorney Drout; client has now accepted his own proposal to value property at \$377,000.00 and there is a stipulation, but client is questioning wording in stipulation. Counsel has not yet been authorized to withdraw so stipulation will probably have to be approved by counsel.	0.50	150.00
08/25/2022	Email exchange with Attorney Drout, Attorney Rebecca Quiroz from Trustee's office and client seeking approval of stipulation; counsel advises he will not sign off on stipulation inasmuch as wording has changed from original stipulation and counsel was not involved in negotiations.	0.40	120.00
	For Current Services Rendered	38.40	11,520.00

Expenses

10/04/2021	Credit reports (cost for joint report for Joseph and Barbara).	64.00
10/22/2021	Chapter 13 Filing Fee paid.	313.00
07/19/2022	Filing fee for motion to sell real estate free and clear of liens.	188.00
	Total Expenses	565.00
	Total Current Work	12,085.00

Payments

10/01/2021	Payment Received from Client to Commence Chapter 13 Filing.	-2,000.00
10/01/2021	Payment Received for Filing Fee.	-313.00
10/01/2021	Payment Received for Credit Report.	-50.00
	Total Payments	-2,363.00
	Balance Due	\$9,722.00
	Please Remit	\$9,722.00

BALANCE NOT PAID INCURS A CHARGE OF 1.5% PER MONTH (18% Per Year).